



State of Utah

Department of  
Environmental Quality

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*Executive Director*

DIVISION OF AIR QUALITY  
Cheryl Heying  
*Director*

JON M. HUNTSMAN, JR.  
*Governor*

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*Lieutenant Governor*

DAQE-IN0140240007-08

August 14, 2008

Michelle Miller  
West Liberty Foods, L.L.C.  
P.O. Box 318  
207 West Second Street  
West Liberty, Iowa 52776

Dear Ms. Miller:

Re: Intent to Approve: Modification of Approval Order DAQE-AN0140240001-07 to Add  
Equipment and to Increase Natural Gas Consumption, Box Elder County – CDS B; ATT; NSPS;  
HAPs Project Code: N014024-0007

The attached document is the Intent to Approve for the above-referenced project. The Intent to Approve is subject to public review. Any comments received shall be considered before an Approval Order is issued.

Future correspondence on this Intent to Approve should include the engineer's name as well as the DAQE number as shown on the upper right-hand corner of this letter. Please direct any questions you may have on this project to Mr. Maung Maung. He may be reached at (801) 536-4153.

Sincerely,

John T. Blanchard, Manager  
Minor New Source Review Section

JTB:MM:sa

cc: Bear River Health Department

**STATE OF UTAH**

**Department of Environmental Quality**

**Division of Air Quality**

**INTENT TO APPROVE: Modification of Approval Order  
DAQE-AN0140240001-07 to Add Equipment and to  
Increase Natural Gas Consumption**

**Prepared By: Maung Maung, Engineer  
(801) 536-4153  
Email: mmaung@utah.gov**

**INTENT TO APPROVE NUMBER**

**DAQE-IN0140240007-08**

**Date: August 14, 2008**

**West Liberty Foods, L.L.C.**

**Source Contact  
Michele Boney  
(319) 627-6144**

**M. Cheryl Heying  
Executive Secretary  
Utah Air Quality Board**

## *Abstract*

*West Liberty Foods, L.L.C. has requested a modification to the Approval Order DAQE AN0140240001-07 to add an oven and a boiler in order to increase the amount of chicken strip production. The following equipment will be added to the approved equipment list: a Cookstar Oven rated at 2.650 MMBtu per hour, and a boiler rated at 10 mm Btu per hour. This new arrangement will give the company the ability to run two different products through some of the same equipment.*

*The company is located in Box Elder County. Box Elder County is an attainment area of the National Ambient Air Quality Standards (NAAQS) for all pollutants. New Source Performance Standards (NSPS) 40 CFR Part 60 Subpart Dc Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units apply to this installation. National Emission Standards for Hazardous Air Pollutants (NESHAP), and Maximum Achievable Control Technology (MACT) regulations do not apply to this source. Title V of the 1990 Clean Air Act does not apply to this source.*

*The emissions, in tons per year, will change as follows:  $PM_{10} = 2.86$ ,  $NO_x = 3.90$ ,  $SO_2 = 0.02$ ,  $CO = 11.35$ ,  $VOC = 2.16$ ,  $HAP$  (formaldehyde) = negligible.*

*The potential to emit totals, in tons per year, will stay the same as follows:  $PM_{10} = 8.81$ ,  $NO_x = 17.67$ ,  $SO_2 = 0.22$ ,  $CO = 20.35$ ,  $VOC = 9.75$ ,  $HAP$  (formaldehyde) = 0.02.*

The Notice of Intent (NOI) for the above-referenced project has been evaluated and has been found to be consistent with the requirements of the Utah Administrative Code Rule 307 (UAC R307). Air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an Approval Order by the Executive Secretary of the Utah Air Quality Board.

A 15-day public comment period will be held in accordance with UAC R307-401-7. A notice of intent to approve will be published in the Box Elder News & Journal on August 20, 2008. During the public comment period, the proposal and the evaluation of its impact on air quality will be available for both you and the public to review and comment. If anyone so requests a public hearing, it will be held in accordance with UAC R307-401-7. The hearing will be held as close as practicable to the location of the source. Any comments received during the public comment period and the hearing will be evaluated.

Please review the proposed Approval Order conditions during this period and make any comments you may have. The proposed conditions of the Approval Order may be changed as a result of the comments received. Unless changed, the Approval Order will be based upon the following conditions:

### **General Conditions:**

1. This Approval Order applies to the following company:

#### Site Office

West Liberty Foods L.L.C  
845 North 2000 West  
Tremonton, Utah 84337

Phone Number (435) 207-7000

Fax Number (435) 207-7001

#### Corporate Office Location

West Liberty Foods L.L.C  
207 West Second Street  
West Liberty, Iowa 52776

(319) 627-6144

(319) 627-6140

The equipment listed in this Approval Order shall be operated at the following location:

845 North 2000 West, Tremonton, Utah 84337

Universal Transverse Mercator (UTM) Coordinate System: UTM Datum NAD27  
4,619.446 kilometers Northing, 401.400 kilometers Easting, Zone 12

2. All definitions, terms, abbreviations, and references used in this Approval Order (AO) conform to those used in the UAC R307 and Title 40 of the Code of Federal Regulations (40 CFR). Unless noted otherwise, references cited in these AO conditions refer to those rules.
3. The limits set forth in this AO shall not be exceeded without prior approval in accordance with R307-401.
4. Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved in accordance with R307-401.
5. All records referenced in this AO or in applicable NSPS which are required to be kept by the owner/operator shall be made available to the Executive Secretary or Executive Secretary's representative upon request. Records shall be kept for the following minimum periods:
  - A. Emission inventories Five years from the due date of each emission statement or until the next inventory is due, whichever is longer
  - B. All other records Five years
6. West Liberty Foods, L.L.C. shall install equipment listed in condition number 7 items D, F and M and shall conduct its operations of the Food processing in accordance with the terms and conditions of this AO, which was written pursuant to West Liberty Foods, L.L.C.' NOI submitted to the Division of Air Quality (DAQ) on May 19, 2008.
7. This AO shall replace the AO (DAQE-AN0140240001-07) dated July 9, 2007.
8. The approved installations shall consist of the following equipment or equivalent\*:
  - A. One Boiler
    - Heat input rate: 32.6 mmBtu per hour
    - Manufacturer: Cleaver Brooks
    - Model number: ICB700-800-150
    - Fuel: Natural gas
  - B. Two (2) Boilers
    - Heat input rate: 5.6 mmBtu per hour each
    - Manufacturer: Ludell Manufacturing Co.
    - Model number: DC5600S
    - Fuel: Natural gas

- |    |                  |                          |
|----|------------------|--------------------------|
| C. | One (1) Grill    |                          |
|    | Heat input rate: | 2.25 mmBtu per hour      |
|    | Manufacturer     | Convenience Food Systems |
|    | Model number     | CombiGrill 1000-0-2      |
|    | Fuel:            | Natural gas              |
|    |                  |                          |
| D. | One Boiler       |                          |
|    | Heat input rate: | 12mmBtu per hour         |
|    | Manufacturer:    | Fulton                   |
|    | Model number:    | FT-1200-C                |
|    | Fuel:            | Natural gas              |
|    |                  |                          |
| E. | One Boiler (new) |                          |
|    | Heat input rate: | 10mmBtu per hour         |
|    | Manufacturer:    | Fulton                   |
|    | Model number:    | FT-1000-C                |
|    | Fuel:            | Natural gas              |
|    |                  |                          |
| F. | One Boiler       |                          |
|    | Heat input rate: | 4mmBtu per hour          |
|    | Manufacturer:    | Fulton                   |
|    | Model number:    | FT-0400-C                |
|    | Fuel:            | Natural gas              |

Thermal Oil Heated Equipment

- |    |                         |                          |
|----|-------------------------|--------------------------|
| G. | Two (2) Searing Grills  |                          |
|    | Manufacturer            | Convenience Food Systems |
|    | Model number:           | TwinGrill 1 & 2          |
|    |                         |                          |
| H. | Fryer                   |                          |
|    | Manufacturer:           | Convenience Food Systems |
|    | Model:                  | Easy Fry                 |
|    |                         |                          |
| I. | Fryer                   |                          |
|    | Manufacturer:           | Convenience Food Systems |
|    | Model:                  | Super Fry                |
|    |                         |                          |
| J. | Two (2) Ovens (one new) |                          |
|    | Manufacturer:           | Convenience Food Systems |
|    | Model:                  | CookStar                 |

Steam Heated Equipment

- |    |                |        |
|----|----------------|--------|
| K. | Four (4) Ovens |        |
|    | Manufacturer:  | Marlen |
|    | Model:         | 2X2    |

\* Equivalency shall be determined by the Executive Secretary.

9. Visible emissions from any stationary point or fugitive emission source associated with the source or with the control facilities shall not exceed 10% opacity. Opacity observations of emissions from stationary sources shall be conducted in accordance with 40 CFR 60, Appendix A, Method 9.

For sources that are subject to NSPS, opacity shall be determined by conducting observations in accordance with 40 CFR 60.11(b) and 40 CFR 60, Appendix A, Method 9.

10. The following consumption limit shall not be exceeded:

619,874 million cubic feet of natural gas used per rolling 12-month period

To determine compliance with a rolling 12-month total, the owner/operator shall calculate a new 12-month total by the twentieth day of each month using data from the previous 12 months. Records of consumption shall be kept for all periods when the plant is in operation. Natural gas consumption shall be determined by monthly gas bills.

### **Fuels**

11. The owner/operator shall use only natural gas as fuel in all its process equipment.

### **Federal Limitations and Requirements**

12. In addition to the requirements of this AO, all applicable provisions of 40 CFR 60, NSPS Subpart A, 40 CFR 60.1 to 60.18 and Subpart Dc, 40 CFR 60.40c to 60.48c (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) apply to this installation.

### **Records & Miscellaneous**

13. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this AO, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on the information available to the Executive Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed on the equipment authorized by this AO shall be recorded.
14. The owner/operator shall comply with R307-107. General Requirements: Unavoidable Breakdowns.

The Executive Secretary shall be notified in writing if the company is sold or changes its name.

Under R307-150-1, the Executive Secretary may require a source to submit an emission inventory for any full or partial year on reasonable notice.

This AO in no way releases the owner or operator from any liability for compliance with all other applicable federal, state, and local regulations including R307.

A copy of the rules, regulations and/or attachments addressed in this AO may be obtained by contacting the DAQ. The UAC R307 rules used by DAQ, the NOI guide, and other air quality documents and forms may also be obtained on the Internet at the following web site:

<http://www.airquality.utah.gov/>

The annual emissions estimations below include point source and do not include fugitive emissions, road dust and tail pipe emissions. These emissions are for the purpose of determining the applicability of Prevention of Significant Deterioration, non-attainment area, Maintenance area, and Title V source requirements of the R307. They are not to be used for determining compliance.

The Potential To Emit (PTE) emissions for this source (the entire plant) are currently calculated at the following values:

<u>Pollutant</u>	<u>Tons/yr</u>
A. PM <sub>10</sub> .....	8.81
B. SO <sub>2</sub> .....	0.22
C. NO <sub>x</sub> .....	17.67
D. CO .....	20.35
E. VOC .....	9.75
F. HAP	
Formaldehyde.....	0.02

The DAQ is authorized to charge a fee for reimbursement of the actual costs incurred in the issuance of an AO. An invoice will follow upon issuance of the final AO.

Sincerely,

John T. Blanchard, Manager  
Minor New Source Review Section